

I have been a broadcast engineer for the past 40 years and have spent most of this time at the base of or in close proximity to a variety of broadcast towers. These include towers of varying heights, self-supporting, guyed, painted, unpainted, lit with conventional red beacons, lit with white strobes and unlit.

During this time, I have seen no evidence to support the theory that towers of any size or configuration present a hazard to migratory birds. In all honesty, I can also say that my inspections of the base and surrounding areas of broadcast towers have not revealed a single bird carcass in this 40 year period.

I realize that this directly contrasts and contradicts the statements of those groups proposing changes in the commission's tower marking regulations. However, the claims made by these groups would indicate that the base of every tower is knee deep in dead birds and the piles are getting deeper. My real world practical experience is that this is simply untrue.

In preparing my comments for this rulemaking, I researched many sources looking for verifiable facts that would prove my 40 year experience to be flawed. I was amazed to find that no factual evidence exists to prove a connection between avian mortality and towers of any height and/or lighting scheme. There are no pictures of dead birds below or near broadcast towers, no pictures of birds colliding with towers or guy wires, no necropsy reports on the cause of death of birds found near towers or even counts of avian carcasses found near towers. In short, I was not able to find evidence of any kind that supports the theory that towers pose a danger to migratory birds.

The website that led me to file these comments, [www.towerkill.com](http://www.towerkill.com), offers the following in its "research" section:

"We apologize for the lack of content on this page. Due to difficulties obtaining some of the data required for this section of the website, we are unable to finish it at this time."

How difficult can it be to count dead birds at the base of a tower? The difficulty comes in finding any dead birds in close proximity to any tower. My experience is that birds do not collide with towers or guy wires and die. The lack of content in this "research" section appears to prove my experience correct.

The website goes on to state:

"We feel there is a very real threat that, given the necessary weather conditions, tower-induced mortality may already have reached levels that can

have a noticeable effect on wild bird populations, and that given the projected increase in both numbers of towers and in the density of towers on major migration routes this problem can only become more serious.”

From this statement it is clear that, even to the authors of a website intended to prove the danger towers present to the avian population, there are no easily obtainable facts to prove their points and the action they urge is based only on “feelings.”

Before any final rulemaking, I would urge the commissioners to undertake a simple and easy personal research project by taking a short field trip to a randomly selected broadcast tower in the DC area and search for the bodies of dead birds at or near its base. I am confident that you will find the same thing countless broadcast engineers find every day; no dead birds.

I strongly suggest this inspection and location not be publicly announced in advance. Given the strong emotion that is shared by both sides of this issue, advance notice of a personal inspection by the commissioners could possibly result in the “planting” of evidence or its removal should it actually exist.

The commission is charged with dealing in facts and not feelings. There are no facts to support any change in the tower regulations currently in force. It would be unfair to force new and expensive regulations on existing and planned towers based on the “feelings” of groups that have no scientific data to support their position.

I urge the commissioners to not make any changes in the rules and regulations concerning the marking and lighting of broadcast and other communication towers.